



RECEIVED AUG 23 2004

Conserving California's waterfowl, wetlands, and waterfowling heritage.

August 20, 2004

NE NPR-A Amendment Planning Team
Bureau of Land Management (930)
Alaska State Office
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Anchorage, AK 99513-7599

196939

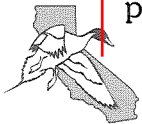
Dear Planning Team:

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The California Waterfowl Association (CWA) is a non-profit organization dedicated to waterfowl, wetlands, and hunting heritage, and is the leading hunting and conservation organization on the Pacific Flyway. We submit this letter as part of the record of public comments on the Bureau of Land Management's (BLM) June 2004 draft amendment to the Northeast Integrated Activity Management Plan/Environmental Impact Statement (IAP/EIS) for the Northeast National Petroleum Reserve-Alaska (NE Reserve). The California Waterfowl Association (CWA) has reviewed the draft in detail, and we strongly urge BLM to retain the current protections in the entire Teshekpuk Lake Surface Protection Area by adopting Alternative A- No Action.

002
Special
Designation

The TLSA supports on the average 14% of the Pacific Flyway's Brant population that migrate to as many as 10 colonies in Alaska and Canada. The TLSA at one time had 30% of the Pacific Flyway black brant molting in this area. Black brant west coast population size continues to fall and is at its lowest recorded level. Disruption of its molting areas may have an impact on its population's ability to rebound in favorable breeding conditions. We note that brant in the Pacific Flyway are important to subsistence hunters on the North Slope, Yukon-Kuskokwim Delta, and Bristol Bay, and also to sport hunters on the Alaska Peninsula (e.g., at Izembek Lagoon), from Washington to California, and Mexico. Any significant reductions in numbers of brant could trigger restrictions or closures of both subsistence and sport harvests (Pacific Flyway Council 2002). The TLSA provides also provides molting habitat for white-fronted geese and serves as critical habitat for northern pintail when the southern prairies are faced with drought.



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CWA is a 501 (c)(3) nonprofit organization (94-1149574).

3 Because of the importance of this area to waterfowl and other wildlife, every effort should be made to minimize impacts on this sensitive northern ecosystem as we pursue new fossil fuel sources to offset the current oil demand. We recognize the efforts of the

004
Birds

oil and gas companies in reducing their disturbance during the breeding and molting periods, but feel that increased development in the area will increase the disturbance in the area as well. Geese are vulnerable to disturbance by people and aircraft during their flightless, energy-demanding molt. Conservationists and scientists are concerned that greater oil and gas development in the Teshekpuk Lake area may result in reduced populations of brant, northern pintail and white-fronted geese. As such, CWA must

5 strongly oppose Alternative B, which would reduce the area closed to oil and gas leasing in the Teshekpuk Lake Surface Protection Area to 213,000 acres, placing in jeopardy areas available to these waterfowl species and displacing them to less optimal habitats. Our Association must also oppose Alternative C.

6 Our Association appreciates the opportunity to comment on the draft Northeast Integrated Activity Plan/Environmental Impact Statement for the National Petroleum Reserve-Alaska, and we strongly urge BLM to adopt Alternative A- the No Action alternative.

Sincerely,



M. Robert McLandress, Ph. D.
President